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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JASON NAYA-ROMEU,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES LLC;  
NATIONAL CONSUMER TELECOM &  
UTILITIES EXCHANGE, INC.; INNOVIS  
DATA SOLUTIONS, INC.; DIRECTV, LLC;  
SYNCRONY FINANCIAL dba SYNCB/CARE  
CREDIT and SYNCB/MATTRESS FIRM  
EVENT; and SILVER STATE SCHOOLS  
CREDIT UNION,

Defendants.

Case No.: 2:22-cv-00580-JCM-DJA

**JOINT MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
PLAINTIFF'S COMPLAINT (FIRST  
REQUEST)**

Plaintiff, Jason Naya-Romeu ("Plaintiff"), and Defendant, DIRECTV, LLC ("Defendant") (collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as follows:

On April 7, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with Plaintiff's Complaint on April 11, 2022. The deadline for Defendant to respond to Plaintiff's Complaint is May 2, 2022. The Parties have discussed extending the deadline for Defendant to respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file its responsive pleading to Plaintiff's Complaint to June 1, 2022.

This is the first motion for an extension of time for Defendant to file its responsive

As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that  
1 occurs during the pendency of this extension.  
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5 DATED this 2nd day of May, 2022.  
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WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

/s/ Ramir M. Hernandez

Ramir M. Hernandez, Esq.  
9 Nevada Bar No. 13146  
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11 Attorneys for Defendant, DIRECTV, LLC

/s/ Gerardo Avalos

Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
8985 S. Eastern Ave. Suite 350  
Las Vegas, NV 89123  
Attorneys for Plaintiff, Jason Naya-Romeu

16 IT IS SO ORDERED:  
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20 UNITED STATES MAGISTRATE JUDGE  
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DATED: May 3, 2022

1                           **CERTIFICATE OF SERVICE**

2                           I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and  
3                           that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESPOND TO**  
4                           **PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 29th day of April, 2022, to all parties  
5                           on the CM/ECF service list.

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7                           */s/ Lisa Cox*  
8                           An Employee of WRIGHT, FINLAY & ZAK, LLP

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